

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

ST. PAUL FIRE & MARINE)	
INSURANCE COMPANY)	
)	
Plaintiff)	
v.)	Civil Action No. 4:10 - CV - 33 - RLV
)	
CANAL WOOD LLC, et al.)	
)	
Defendants.)	
)	

**CONSENT MOTION OF DEFENDANT CANAL WOOD LLC FOR
EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE
RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendant Canal Wood LLC ("Canal Wood") hereby moves for an extension of time to answer, move, or otherwise respond to Plaintiff's Amended Complaint through and including August 13, 2010. Without an extension and pursuant to Fed. R. Civ. P. 15(a)(3), Canal Wood's response to the Amended Complaint would be due on July 26, 2010.

As good cause for the requested extension, Canal Wood shows that, on July 7, 2010, Plaintiff filed a 40-page Amended Complaint containing 157 separate, enumerated paragraphs and attaching 14 exhibits consisting of approximately 270 pages. Canal Wood needs the requested time to analyze the Amended Complaint and formulate an appropriate response to that Amended Complaint. Accordingly,

counsel for Canal Wood respectfully requests an extension through and including August 13, 2010 to formulate an appropriate response to the Amended Complaint.

Counsel for Plaintiff has consented to this requested extension of time.

WHEREFORE, for good cause shown, Canal Wood respectfully requests that this Court enter an Order extending the time period through and including August 13, 2010, for Canal Wood to timely answer, move, or otherwise respond to Plaintiff's Amended Complaint. A Proposed Consent Order is attached hereto for the Court's convenience.

Respectfully submitted this 14th day of July, 2010.

**Parker, Hudson, Rainer & Dobbs,
LLP**

By: /s/Robert M. Brennan

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), NDGA, I hereby certify that this pleading has been prepared in compliance with LR 5.1(B), NDGA.

Respectfully submitted this 14th day of July, 2010.

Parker, Hudson, Rainer & Dobbs, LLP

By: /s/ Scott E. Zweigel

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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2010, I electronically filed the foregoing **CONSENT MOTION OF DEFENDANT CANAL WOOD LLC FOR EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFF'S AMENDED COMPLAINT** with the Clerk of Court using the CM/ECF system, which automatically will send e-mail notification of such filing to the following attorneys of record:

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This 14th day of July, 2010.

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